While Don took a break, John Shea (Lockheed) presented an overview of Lockheed/Martin's status:

Lockheed:
The Chicago RSMS will serve the Southwest Region. Chicago will also serve the MidWest Region. (Other regions are NorthEast and mid-Atlantic). A duplicate center (for disaster recovery purposes) is located in Tarrytown, New York. Most carriers are choosing to interconnect in Chicago. DSET is the vendor for the SOA/LSMS.

Testing:

Acceptance testing - 80% complete
Interoperability testing - verifies IIS (Interconnection Interoperability Specs) (20 days)
NPAC/SMS turn-up test* - verifies FRS (Functional Requirements Spec) (7 weeks)
* - involves the LSPs

The Plan was discussed and revised through the Testing paragraph.

Friday, May 2, 1997

Test Team:
Stan started the morning discussion with the need for establishment of the Test Team. The need for a Inter Company Test Team Coordinator was discussed. Dick Dowd performs a similar function for MCI and was proposed as a possible Test Team Coordinator. Suzanne Brooks will contact Dick about his possible involvement. Stan established a conference call to establish the individual LSP players, outline their functions, and set an initial meeting date for the Test Team:

Test Team
Friday - May 9, 1997
8:00 - 9:00 a.m. CDT

Each LSP would have 1-2 representatives on the team. It was noted that the current view of the critical time for Houston is between 1/15/98 and 3/31/98.

Follow-up Implementation Team:
A follow-up conference call for the Implementation Team was established for Friday, May 16, 1997. The revised Houston MSA Plan would then be reviewed. Stan would also make the updated copy of the Generic Company Plan available for any interested companies:

Implementation Team
Friday - May16, 1997
8:30 - 10:00 a.m. CDT

Next Meeting:
Stan will make arrangements for the next meeting. The costs for the next meeting will be allocated among the participants (i.e., conference costs will be included in the room charge):

Implementation Team Meeting
Houston, Texas
June 10 & 11, 1997

(The next Operations Team meeting will be June 26 & 27)

911:
Concerns regarding 911 were presented by Ross Sherohman who is the administrative representative for 9 counties surrounding Houston.

Concerns Included:

1. Methods need to be in place for a statewide or national database which would include information (i.e., address, phone numbers) so that in an emergency the PSAP operator can make one call to get all the information required.
   (NENA Standards with 4 alpha character designation of each LSP).
2. 911 requires special trunking with multiple NPAs. Will LNP require any additional trunking?
3. 911 wants to be tested FIRST! 911 needs to know the impacts from LNP up front.

Mike Rydman expressed concerns that when a customer ports within a rate center, they may actually port to a different 911 tandem. He has checked SWBT rate centers and this should not occur. He is in the process of checking other independent territory based upon a map from his 911 coordinator. He will share his findings with the Implementation Team. For Houston, GTE and SWBT are the only 2 selective routing providers for 911. GTE may want to check 1525 for their rate center boundaries and the areas they serve.

Three things are required for a 911 call to complete:

1. Route to the proper 911 tandem
2. Route via proper trunk group
3. Different trunk groups for different NPAs.

A trunk group can have only 1 default routing and if a customer is sent to a wrong tandem or over the wrong trunk group, then the information (i.e., address) will be passed to the PSAP - this is Ross's major concern.

Karen suggested that a Houston MSA 911 presentation be made to the Implementation Team by SWBT and GTE. This could be put on the next meeting's agenda. This presentation would include an overview of the Houston MSA and the NENA standards - which have not been agreed to for Houston.

SWB Region MSAs - SWBT Test Plan Timeline:
Don then reviewed the (Draft 4/17/97) SWBT Test Plan Assumptions and Timelines for the SW Region MSAs. Key Inter Company dates are as follows for each MSA:

MSA	Begin Inter Company Testing	Live Commercial Ready to Port Date
Houston	2/2/98	3/31/98
Dallas, St. Louis	3/16/98	5/15/98
Ft. Worth, Kansas City	5/4/98	6/30/98
San Antonio, Austin Memphis, Okla. City	7/31/98	9/30/98
El Paso, Tulsa Little Rock, Wichita	10/19/98	12/31/98

Houston Rate Centers:
Mike Rydman distributed a listing of the Houston rate centers. The industry policy on porting within a rate center was briefly discussed. Mike gave an example where numbers will not be available for porting (i.e., an Aldine rate center number cannot be ported to a location in the Airline rate center).

Katy emphasized that rate centers and calling scopes are not the same thing.

Suzanne noted that they may be required to assign NXX 100-groups to specific rate centers.

Follow-up Items for the Next Meeting:

- Code Opening Process
- LRN Assignment Guidelines
- 911 Assessment
- NENA Standards

IMPLEMENTATION TEAM MEETING
HOUSTON, TEXAS
MAY 1 & 2, 1997

Name	Company	Address	Phone	Fax
Don Dabney	SWBT	One Bell Center 40-W-03 St. Louis, MO 63101	314-235-1419	314-235-4991
Mike Rydman	SWBT - Houston	6500 West Loop South Zone 5.3 Houston, TX 77401	713-567-2074	713-567-7240
Bobbie Barnes	SWBT	One Bell Center 40-W-07 St. Louis, MO 63101	314-235-4991	314-235-4991
Pamela Rak	SWBT - St. Louis	115 W. Adams Kirkwood, MO 63122	314-957-1604	314-957-6871
Leo Marcotte	Stratus	14785 Preston #680 Dallas, TX 75240	972-383-3136	972-458-2149
R. Lois Bessee	GTE	1702 Hampton Rd. Texarkana, TX 75503	903-798-4642	903-798-4402
Jack Smith	Sprint	600 New Century Parkway New Century, KS 66031	913-791-4657	913-791-4605
Harvey Wright	Sprint	600 New Century Parkway New Century, KS 66031	913-7914562	913-791-4605
Bill Hazlett	Ft. Bend Tel Co	P.O. Box 1127 Rosenberg, TX 77471	713-726-9800	713-726-9813
Glenn D. Jones	Central Texas Tel CoOp	P.O. Box 627 Goldthwaite, TX 76844	915-938-5611	
Ralph Albright	Alltel	P.O. Box 650 Sugarland, TX 77478	281-490-9263	281-490-9499
Gary Glazier	Alltel	One Allied Drive Little Rock, AR 72203	501-661-5103	501-558-6102
Preston Warren	Alltel	One Allied Drive Little Rock, AR 72203	501-661-8377	501-558-6102

Name	Company	Address	Phone	Fax
Mike Humpert	Community Telephone	P.O. Box 130 Windthorst, TX 76387	817-423-6201	817-423-2111
Mike Smith	Central Texas Tel CoOp	P.O. Box 627 Goldthwaite, TX 76844	915-938-5611	
Tim Smoak	Oklahoma Corp Comm	Public Utilities Division P.O. Box 52000-2000 Oklahoma City, OK 73152-2000	405-522-3351	405-522-3371
Mark Lancaster	AT&T	1100 Walnut 6th Floor Kansas City, MO 64106	816-654-4383	816-654-2888
Marilyn Murdock	SWBT	500 E 8th St Kansas City, MO 64106	816-275-3990	816-275-0683
Lori Barry	AT&T	5501 LBJ Freeway Dallas, TX 75240	972-778-2538	972-778-2719
Maggie Lee	Illuminet	8500 W 110th St. Suite 600 Overland Park, KS 66210	913-344-6229	913-469-9229
Katy Trospek	TSTCI	3721 Executive Center Dr. #200 Austin, TX 78731	512-343-2544	512-343-0119
Ed Gonzales	AT&T	5501 LBJ Freeway Dallas, TX 75240	972-778-2958	972-778-2861
Rod Owens	SWBT - Dallas	One Bell Plaza Room 3360 Dallas, TX 75201	214-464-2800	214-464-4960
Fred Ford	GTE	MC TXD 1921 G 500 E Carpenter Freeway Irving, TX 75062	972-717-7791	972-717-0932
Suzanne Brooks	MCI	2250 Lakeside Blvd Richardson, TX 75082	972-918-1430	972-918-1499
Donna McLaughlin	SWBT	One Bell Center 8-G-07 St. Louis, MO 63101	314-235-9488	314-331-1199
John Shea	Lockheed/Martin	9 Beechnut Dr Long Valley, NJ 07853	908-852-7085	908-850-0329

Name	Company	Address	Phone	Fax
Don Casteel	SWBT - San Antonio	1010 N. St. Marys Room 1205 San Antonio, TX 78215	210-222-5490	210-222-7135
James Gideon	AT&T	5501 LBJ Freeway Dallas, TX 75240	972-778-2667	972-778-2681
Karen Kay	TWC	160 Inberness Drive West Englewood, CO 89112	303-705-1811	303-705-1814
Robert Carson	TCG	1301 Fannin Suite 1290 Houston, TX 77002	713-650-7921	713-210-7630
J. Ross Sherohman	911 HGAC	P.O. Box 22777 3555 Timmons Houston, TX 77227-2777	713-993-2486	713-993-4548
Stan Weeks	AT&T	5501 LBJ Freeway Dallas, TX 75240	972-778-2682	972-778-2681
Steve Wilt	Oklahoma Corp Comm	Public Utilities Division P.O. Box 52000-2000 Oklahoma City, OK 73152-2000	405-522-3350	405-522-3371

RM 9101
Comments of SBC
July 10, 1997

Affidavit of John Stankey
Pacific Bell

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554

In the Matter of:	)	
	)	
Implementation of the Local	)	CC Docket 96-98
Competition Provisions in the	)	
Telecommunications Act of 1996	)	
	)	

AFFIDAVIT OF JOHN T. STANKEY
ON THE STATUS OF OSS AT PACIFIC BELL

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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554

In the Matter of:	)	
	)	
Implementation of the Local	)	CC Docket 96-98
Competition Provisions in the	)	
Telecommunications Act of 1996	)	
	)	

State of California	)	
	)	ss.
City and County of San Francisco	)	

AFFIDAVIT OF JOHN T. STANKEY
ON THE STATUS OF OSS AT PACIFIC BELL

I. INTRODUCTION.

1. My name is John T. Stankey, and my business address is 370 Third Street in San Francisco, California. I am Pacific Bell's Vice President for Resale Operations. In that capacity I am responsible for the provisioning of service to competitive local exchange carriers ("CLECs") for resale to end-users, which includes making available to CLECs access to our OSS for pre-ordering, ordering, provisioning, maintenance and repair, and billing. This responsibility includes the operations of the Local Service Center ("LSC"), which processes CLEC orders, and the Local Operations Center ("LOC"), our maintenance and repair organization. In addition, I have personal knowledge of the manner in which we currently provide unbundled network elements to CLECs and our future plans in that area, which is also part of my responsibility.

2. I have a Bachelor of Arts Degree in Business Administration Finance from Loyola Marymount University in Los Angeles, California and a Masters in Business Administration, Marketing and Information Systems from the University of California at Los Angeles. I have been the Executive Director for Systems Development Customer Service in our Advance Communications Network Group, and I have held management positions at Pacific involving various disciplines including responsibility for outside plant, maintenance, installation, engineering and for provisioning of service to our retail customers.

II. PURPOSE OF AFFIDAVIT AND SUMMARY.

3. In its Public Notice (released June 10, 1997), the Commission requested interested parties to address the status of OSS for resale and for unbundled network elements. The notice further requested that, in discussing the status of OSS, parties separately should address certain identified OSS functions, including pre-ordering, ordering, provisioning, maintenance and repair, and billing. In the following pages, I address the standards that we have applied in providing OSS access to CLECs, explain briefly the efforts we have undertaken to provide service to CLECs, and respond to the Commission's request concerning the status of OSS provisioning, including separately addressing each function identified by the Commission.

III. OSS IMPLEMENTATION STANDARDS.

A. Our Goal is to Provide OSS Parity.

1. Pacific Bell must provide CLECs with service at least equal in quality to that which Pacific Bell provides to itself.

4. As we understand the Telecommunications Act of 1996, it requires that Pacific Bell provide service to CLECs at levels at least equal in quality to that which Pacific Bell provides to

itself, its affiliates, and other parties. This is a comparative measure: CLECs are not entitled to any particular level of service, but rather are entitled to service at the same level as Pacific Bell provides to itself. Therefore, service parity must be measured (1) by class of service (*e.g.*, residence, business); (2) geographic area; and (3) over a comparable time period. As long as all end users experience a comparable service level for the same class of service, geographic area, and time period, the requirements of the Act are met.

5. We use the same measures that we use internally for equivalent retail products (where comparable processes exist) to verify that CLECs are receiving service at parity . These measures are common throughout the telecommunications industry and are used to manage Pacific Bell's business today. Where comparable retail product processes do not exist, and a new process has been designed specifically for wholesale and resale, then performance standards developed in interconnection agreements apply.

6. For example, Pacific Bell's agreement with AT&T states as follows: "PACIFIC shall provide services to AT&T that, for any relevant period of measurement, have substantially the same characteristics of timeliness and performance as PACIFIC provides at retail and, for such purpose, those services shall be deemed to have substantially the same characteristics for any population of thirty (30) or more observations if it has the same statistical distribution at the 90% confidence interval. Service parity is achieved when Pacific's service performance, as defined by the designated comparable measures, is within 1.65 standard deviations (90% confidence level) of the average retail performance for the equivalent retail product or service ...." For those service elements where no retail equivalent exists, performance measures are based on specified service levels given in the contract.

2. The California Public Utilities Commission is well on its way to defining the OSS network and establishing standards.

7. In December of 1996, the California Public Utilities Commission ("CPUC") instituted a proceeding in its Local Competition and OANAD dockets regarding the appropriate definition of OSS provisioning and standards (e.g., "to develop minimum criteria and standards which should be required in providing the OSS to CLECs on a nondiscriminatory basis").[1] Since then the Commission has conducted several workshops and received comments on the current OSS provisioning and what should be included going forward. The most recent round of comments concluded on June 27, 1997.

3. Pacific Bell has undertaken substantial efforts to make its OSS accessible to CLECs at parity with Pacific Bell's own access.

8. The development work needed to make services available for resale in accordance with the Act and the rules of the FCC and CPUC was one of the most substantial Pacific Bell local competition implementation efforts. This undertaking included major OSS modifications to provide resale CLECs with access to pre-ordering, ordering, provisioning, maintenance and repair, and billing functions at parity with Pacific Bell's own operations. The resale effort also involved a great deal of other work, with seven product-specific Core Teams (e.g., Basic Exchange Service; Centrex/PBX; Private Line; ISDN; 800/WATS) commissioned to perform development activities related to particular offerings. The work of the Basic Exchange Service Core Team, while larger in scale than the other individual Core Teams, illustrates the changes required to implement the resale mandate. That Core Team's efforts included:

- Fundamental modifications to more than 20 support systems.

[1] Administrative Law Judge's Ruling soliciting Comments on Workshop Agenda, December 23, 1996, p. 3 (R.95-04-043; I.95-04-044).

- Design and implementation of a customized routing option for OA and/or DA served by resold lines.
- Design of a new service order format.
- Creation of a new class of service and more than 50 new USOCs.
- Establishment of a single point of contact customer service and ordering center.
- Establishment of a single point of contact maintenance center.
- Upgrades to network and switching support systems to include new translations and look-up functionality.
- Development of CLEC referral capabilities through the installation of Automated Response Units in Pacific Bell's retail business offices and repair bureaus to assure proper handling of inquiries from CLEC customers.
- Development of new methods and processes, including training in those methods and processes, affecting more than 25,000 employees.
- Revision of the CLEC Handbook, creation of a new registration process, and scheduling and delivery of a series of workshops to facilitate CLEC entry into the local market and their ability to do business with Pacific Bell.
- Preparation and filing of new resale tariffs.
- Extension of suspend and restore capabilities to CLECs.

9. Pacific Bell has implemented on-line access to most pre-ordering functions except the customer service record; we offer on-line and/or batch processing access to ordering for resale, links, and interim number portability (INP); and we provide various forms of electronic access to the other relevant OSS functionalities. In addition, Pacific Bell is implementing an EDI option

for ordering links, ports, and number portability, will implement EDI for ordering basic exchange resale this year, and is committed to implementing EDI for other products after industry standards are finalized. Of course, Pacific Bell continues to process manual requests (such as faxes and telephone calls), although it strongly prefers electronic access at higher volumes in order to reduce costs, improve responsiveness and accuracy, and free personnel to work on tasks that require human intervention.

10. We have committed financial and human resources implementing these measures. Implementing the parity directive required us to modify over 40 existing systems and develops six new gateways and other systems. In 1996, Pacific Bell incurred roughly 50 million dollars in expenses and capital investment and utilized hundreds of personnel (many of whom were reassigned from retail operations) to meet demands for CLEC access and enhance mechanization. The projected expense this year will be even greater: approximately 80 million dollars and 456 people dedicated to the provisioning and further development of OSS access.

11. We have entered into scores of interconnection agreements with CLECs, including cable and wireless providers of service, and we are exchanging traffic over approximately 22,500 interconnection trunks. To date, CLECs have migrated or placed new orders for approximately 110,000 residential and business basic exchange access lines from Pacific Bell, and an average of approximately 6,000 new orders are completed each week. Our capacity will increase once flow-through of high volume basic exchange migration "as is" and "as specified" resale orders is implemented on July 21, 1997. While the implementation of "flow-through" originally was scheduled for May 31, 1997, we mutually agreed with the CLECs to delay implementation, so as to allow them to make necessary changes to their own in-house systems.

IV. STATUS OF OSS RESALE AND UNBUNDLED NETWORK ELEMENTS.

A. Pacific Bell has Attempted to Create a Cooperative and Responsive Environment for California CLECs.

12. We have endeavored to create an environment where CLECs dealing with Pacific Bell receive responsive, cooperative treatment. To this end, we have implemented numerous initiatives to assist CLECs in dealing with Pacific Bell. For example:

1. CLEC Handbook.

13. In 1995, Pacific Bell prepared the first edition of the CLEC Handbook. This comprehensive document, which is available on-line and is equivalent to four four-inch binders, is updated regularly to track new services, products, and capabilities that Pacific Bell provides to CLECs. It explains various aspects of the Pacific Bell methods and procedures used by CLECs, specifies file formats, and discusses general requirements for operating as a CLEC in California. The Handbook is updated on a weekly basis, and the updates are highlighted in the system.

2. LI Office.

14. Pacific Bell has developed LI Office, a Graphical User Interface, Windows application that acts as a dialer to connect CLECs with various Pacific Bell applications. Through LI Office, a CLEC can provide registration information (e.g., Billing Account Numbers and provide their office and repair service bureau telephone numbers to enable Pacific Bell to refer calls from a CLEC's customer that inadvertently ends up in a Pacific Bell repair office), and two-year forecasts of telecommunications needs (e.g., facility based forecasting, LISA trunks, DNCF lines, LINK volumes, operator assistance, and DA call volume). The dial-up capability of LI Office allows CLECs to place orders to the CESAR order platform, access the PBSM platform to order Centrex and ISDN services and to report problems on those lines, send listings

files to the Listing Gateway in Pacific Bell, and send information to the E911 Gateway. CLECs also can access the Handbook and resale ordering forms through LI Office.

3. Workshops and training.

15. Pacific Bell continues to hold both individual and group CLEC workshops. These workshops have focused on different aspects of the relationship between CLECs and Pacific Bell, such as educating and training CLECs on the processes for ordering resale services, listings, unbundled network elements, and local interconnection services; developing procedures for handling customer migration; and identifying information exchange requirements.

16. Other training activities include loading LI Office on the CLECs' systems and training their personnel in its use. Pacific Bell also provides training on accessing pre-ordering functions (e.g., address validation, telephone number assignment, feature availability) through our CLEO system. This training is available either at Pacific Bell's location or at the CLEC's offices. Pacific Bell has conducted over 20 training sessions with various CLECs. In addition, Pacific Bell offers advanced training classes for those CLECs that desire additional instruction.

4. Participation in national forums.

17. Pacific Bell is a long-time participant at the Ordering and Billing Forum ("OBF") and has been actively pursuing national guidelines for ordering resale services, unbundled network elements, and local interconnection. Approximately 30 subject matter experts have been working diligently with industry participants in these industry forums. Pacific Bell was an advocate for allowing local service issues to be handled through the OBF and has worked with both CLECs and other LECs on the development of national guidelines for ordering and information exchange.

5. Cooperative testing.

18. Pacific Bell began its Resale Technology Testing program on May 1, 1996. We tested several products cooperatively with 10 CLECs, including Basic Exchange Services (Residence and Business), PBX, and a small number of ISDN and CENTREX requests. The test included orders to process new resale accounts, migration of accounts with no changes ("as-is"), migration of accounts with changes ("as specified"), and feature changes on previously migrated accounts. Approximately 800 test orders were generated. As a result of this program, we were able to identify where problems could occur and develop improvements to interfaces and internal Pacific Bell processes. We have begun the process of identifying appropriate performance metrics based on test findings, and have documented "key learnings" developed during the Resale Technology Test.

19. In addition to the completed Resale Technology Test, a number of CLEC contracts, both resale and facilities-based, include commitments to participate in cooperative testing by Pacific Bell. The scope and extent of such cooperative testing is defined by each individual CLEC/Pacific Bell contract. Pacific Bell has designed a cooperative test plan that will meet our contractual obligations for both types of carriers. The purpose of the Pacific Bell/CLEC Cooperative Test will be to evaluate our mutual ability effectively to exchange the information required for pre-ordering, ordering, provisioning, maintaining and billing of resale and facility-based products and services. We have already successfully tested NDM, PBSM and CLEO. Additionally, the most recent release of RMI began to be tested by MCI in June of this year.

B. Overview of OSS Access.

1. On-line and batch processing access.

20. To facilitate electronic CLEC access to Pacific Bell's OSS, Pacific Bell is utilizing a user-friendly "gateway" approach that minimizes the number of interfaces CLECs need to learn and use. Internal Pacific Bell OSS functions are performed by a number of different legacy systems that have been developed over many years of operations. Rather than compelling CLECs to learn the specific operation of each of these systems – such as the thousands of Universal Service Order Codes (USOCs) used in the Service Order Retrieval and Distribution System (SORD) – Pacific Bell eases their burden by allowing CLECs to use their own language and format. The translation into Pacific Bell's system has been performed by service representatives in the LSC (Local Service Center). That function will, however, be mechanized as of July 21, 1997 for basic exchange resale migration (assuming the CLEC uses the electronic interface provided and inputs a complete and correct order), which can represent a significant percentage of CLEC orders.

21. Pacific Bell already has developed two forms of electronic access to its OSS: on-line, real-time access over either a dial-up or dedicated line, and batch processing. (As explained below, on-line applies to certain services and functions, and batch processing to others.) To access OSS on-line, CLECs need a PC product that provides a front end interface. As soon as the CLEC contacts Pacific Bell with a request to do business, Pacific Bell provides the CLEC with LI offices a PC interface, at no charge, or the CLEC can provide its own system. The CLEC access to our systems require security, which we provide through SECURID cards, which are necessary to access certain databases. Several CLECs have been utilizing on-line access for

well over a year. This experience demonstrates that Pacific Bell's on-line access offering supports effective competition.

22. Pacific Bell's batch processing product utilizes Connect:direct™ (commonly known as Network Data Mover or NDM), a de facto standard for bulk data transfer. In the absence of the establishment of agreed upon industry electronic interface standards, Pacific Bell developed a local data format standard called Resale Mechanized Interface (RMI) for resale of basic exchange and PBX services. Requests for these services can be transmitted via NDM. (Ordering of Centrex and ISDN for resale is supported utilizing the on-line order entry application in PBSM, which is also used by Pacific Bell's large retail customers.) AT&T, Genesis, MCI, and Sprint are sending approximately 80% of their orders to Pacific Bell by NDM.

2. Electronic Data Interface (EDI).

23. For larger CLECs with the business requirement for such access, Pacific Bell will be deploying more sophisticated interfaces, such as app-to-app, to handle Electronic Data Interchange (EDI) transactions, consistent with industry standards, where available. (App-to-app refers to the ability of a CLEC's system to communicate directly with Pacific Bell's system. EDI is a format for data interchange.) Flow through will be used to handle orders received through EDI to the same extent as it applies to orders received through other electronic access methods. Pacific Bell will begin implementing EDI this year.

3. Electronic Bonding Interface (EBI).

24. Pacific also has deployed another sophisticated app-to-app interface, Electronic Bonding Interface (EBI), to handle electronic data interchange of trouble reports transactions consistent with industry standards. EBI is a format for exchanging maintenance and repair data. Flow through will be used to handle trouble reports received through EBI to the same extent as it

applies to trouble reports received through other electronic or manual access methods. EBI is currently ready for testing with any CLEC.

4. Manual Access.

25. Pacific Bell offers manual access to all OSS functions on an interim basis through telephone or facsimile contact with Pacific Bell service representatives. Manual access will continue to be offered in support of extremely low volume and custom design products that require significant conferring on design details. As demand increases and standards are developed, migration to mechanized alternatives will be pursued. Where mechanized alternatives exist, Pacific Bell offers manual access on request, but cannot be expected to meet performance standards based on a more efficient, mechanized flow. Continued use of manual access at higher volumes impairs responsiveness, greatly increases expense, causes delays, and undermines service quality.

C. Access to OSS Functions - Resale.

1. Pre-Ordering.

26. Today, CLECs can negotiate service with end-users by accessing Pacific Bell either on-line or through manual methods. The functions involved in pre-ordering include: service location validation; telephone number assignment; product and features availability; carrier identification codes (CICs) and due date scheduling. The on-line process allows a CLEC to have computer access to the Pacific Bell CLEO gateway. Once connected to this gateway, the CLEC can interact with Pacific Bell's PREMIS data base to obtain telephone number assignment and reservation for one to five basic exchange numbers, single line ISDN, one to five COPT (pay telephone) lines, and access to "easy numbers" (e.g., sequential numbers or numbers with repeating digits).

27. The CLEC can also determine whether a "dispatch" is required for residential service and whether there is "working service" at the location specified by the end user. The CLEC can either assign a due date to its customer based on standard intervals, or, where a dispatch is required to establish service, can obtain the next available due date. In addition, the CLEC can verify the customer's address, serving wire center, primary directory, and other information. Finally, the CLEC can access Pacific Bell's APTOS system, which lists the availability of features in the end office switch and identifies any special operating conditions affecting the end office. For a CLEC that does not choose to use electronic access, all of the functions described above are available by calling the LSC, although we strongly encourage utilization of the provided electronic interface.

28. The only difference for CLEC on-line pre-ordering between CLECs and Pacific Bell is that CLECs do not have on-line access to the CSR, whereas Pacific Bell representatives do. We are working to provide CLECs with on-line access to the CSR. Because CSRs contain customer proprietary network information (CPNI), certain safeguards must be applied to prevent disclosure of their contents to unauthorized third parties. Once proper documentation has been provided for either a business or residential customer, Pacific Bell sends the CSR within one day via facsimile. For records of 50 pages or less, this time frame was reduced to four hours in April 1997 through increased mechanization of Pacific Bell's internal processes. Larger records take longer because CSRs of this size are sent overnight to the CLEC. In addition, if the CLEC requests resale customer migration "as is" and indicates that it has the appropriate customer authorization, Pacific Bell will process the order "as is," so the CLEC does not need the CSR to migrate the customer.

29. Pacific Bell will be introducing additional enhancements to the pre-ordering system. We will be supplementing access to CSR data through on line access, and we will introduce app-to-app functionality via the EDI gateway system through which CLECs will be able to complete service location validation, product/feature/CIC availability, and telephone number assignments. Finally, if standards are agreed upon in time, Pacific Bell will implement gateway enhancements by the end of 1997 that will provide CLECs with app-to-app access to PBX/DID inquiry process and due date scheduling, supplementing the current on-line access capability.

2. Ordering & Provisioning.

a) Ordering.

30. CLECs may submit basic exchange resale orders via batch processing, for certain services manually (e.g., by fax) or, on-line via PBSM. Once received by Pacific Bell through any of these methods service representatives in the LSC check orders for errors and reformat them for entry into SORD. Service orders are distributed electronically to the service representatives, who use desk-top functions to reformat the order for entry into SORD. As with all other ordering procedures, Pacific Bell's expedited order policy (medical- related or other potentially serious situations) applies equally to CLEC customers and Pacific Bell customers.

31. The principle difference between this process and that used by Pacific Bell representatives is that CLEC orders are reformatted prior to entry into SORD, whereas Pacific Bell orders for basic exchange services are keyed directly into SORD. This difference will end for most basic exchange resale migration orders on July 21, 1997, when flow through of these orders into SORD is implemented. Flow through is a mechanized process that translates the incoming order format into a format that can be used in SORD. For orders that can be

successfully flowed through – that is, orders that are complete, correct, and of the type programmed for flow through – this capability will minimize human errors, reduce processing time, and free resources to help in other areas. With electronic flow-through, the primary function of the LISC personnel will be handling exceptions of migrations.

32. Ordering for Centrex, ISDN (through PBSM), and PBX (through RMI) is available now. Flow through for Centrex and ISDN will not be available because of the complex nature of these services. In Pacific Bell's own, retail environment, orders for these services require multiple customer contacts by Pacific Bell personnel that do not interact with SORD, a job that in the resale context is assumed by CLEC personnel.

b) Provisioning.

33. Once orders are entered into SORD, there are essentially no differences in provisioning between Pacific Bell orders and CLEC orders. However, migration of resold services for CLECs involves two separate orders: a "disconnect" of Pacific Bell's service and a "connect" of the CLEC's service. Some CLECs have complained that when Pacific Bell transfers customers to a CLEC, there have been temporary disconnections of the customer's service.[2] Pacific Bell has taken decisive and effective steps to address this problem. Our centralization of all CLEC provisioning in a single, state-wide service center (CSC) with dedicated staff (which occurred in April) that handles both connect and disconnect service orders has reduced the possibility of disconnects substantially. As a result, the incidence of disconnects from

[2] Although AT&T has filed a complaint regarding this problem with the California Public Utilities Commission, it has only allege five instances in which this has occurred. AT&T Communications of California, Inc. v. Pacific Bell, California Public Utilities Commission, Case No. 96-12-044 at 6-7 (filed Dec. 23, 1996).